

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

ELECTRONIC PRIVACY INFORMATION CENTER,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.: 11-0881 (HHK)
	)	
FEDERAL TRADE COMMISSION,	)	
	)	
Defendant.	)	
	)	

**CONSENT MOTION TO ENLARGE TIME TO FILE ANSWER  
OR OTHERWISE RESPOND TO COMPLAINT**

Defendant, the Federal Trade Commission (“FTC”), respectfully requests an extension of thirty days of the current deadline for it to file an answer or otherwise respond to the complaint in this case. This case arises under the Freedom of Information Act (“FOIA”). Pursuant to the Court’s Minute Order of July 14, 2011, FTC’s answer is currently due July 29, 2011. EPA requests a new deadline of Monday, August 29, 2011. Counsel for Plaintiff consents to this motion.

Good cause exists for the Court to extend the deadline under Rule 6(b)(1)(A) because the parties are nearing agreement on a settlement of the case. Counsel have largely come to agreement on the substance of the terms of a settlement, and need only work out a few details, including the wording of a settlement stipulation. Although counsel anticipates that this will go smoothly, undersigned counsel will be out of the office for two weeks starting next week, and will need time upon returning to the office to catch up with other accumulated work in other cases. Accordingly, the FTC respectfully requests 30 additional days of the current deadline.

This is the FTC’s third request to extend this deadline. A proposed order is attached.

